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October 13, 2010

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation In the Matter of Connect America Fund WC Docket No. 10-90; A National Broadband Plan for Our Future GN Docket No. 09-51; and High-Cost Universal Service Support WC Docket No. 05-337

Dear Ms. Dortch:

On behalf of the Rural Broadband Alliance (“RICA”), I met today with Carol Matthey, Amy Bender, Patrick Halley, Katie King, and Elise Kohn of the Wireline Competition Bureau (“WCB”) Staff to inform them of the formation of the Rural Broadband Alliance (“Alliance”).

The Alliance is a growing coalition of more than sixty rural incumbent local exchange carriers formed to advance sensible, evidence-based policies for the deployment and adoption of broadband services for all of the nation’s citizens including consumers and businesses residing in rural, insular and high cost-to-serve areas of the nation. The Alliance has recently issued a paper prepared by economist Dale Lehman entitled “The National Broadband Plan: Bringing Rural America into the 21st Century or Bringing it to its Knees?”

On behalf of the Alliance, I provided the WCB Staff members with a copy of the paper, which is attached to this transmission for inclusion in the record of the above-referenced proceedings.

In his paper, Dr. Lehman, a Professor of Economics and Director of the MBA and Executive MBA programs at Alaska Pacific University, analyzes the universal service aspects of the National Broadband Plan (“NBP”) and concludes, “The current effort contains much useful information and modeling – but, as a planning effort falls far short of the goal.”

Dr. Lehman notes in his paper, “The plan provides no mechanism for recovery of investments already made under the current rules, to provide universal service to rural communities. The result is increased uncertainty for small rural carriers – a surefire way to undermine further investment in rural networks.”

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Related to this finding by Dr. Lehman, I addressed the need to restore stability and to provide certainty in order to foster the development and maintenance of universal service in rural service areas in a manner consistent with the overall objectives of the National Broadband Plan.

Sincerely,

s/Stephen G. Kraskin

cc: Carol Matthey
Amy Bender
Patrick Halley
Katie King
Elise Kohn